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8
9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA—SAN FRANCISCO DIVISION

11
12 GUSTAVO REYES and MARIA TERESA
GUERRERO, husband and wife, individually
13 and on behalf of others similarly situated,

14 Plaintiffs,

15 vs.

16 WELLS FARGO BANK, N.A., a national
bank; and DOES 1-100, inclusive,

17 Defendants.
18

Case No. 3:10-cv-01667-JCS

**STIPULATION AMENDING
SETTLEMENT AGREEMENT IN
SUPPORT OF PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Hearing Date: April 19, 2013
Time: 9:30 a.m.
Judge: Hon. Joseph C. Spero
Trial Date: None Set

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20 IT IS HEREBY STIPULATED, by and between plaintiffs Gustavo Reyes and Maria
21 Teresa Guerrero and defendant Wells Fargo Bank, N.A. (the“Parties”), that paragraph B.1.b (p.4) of
22 the Class Action Settlement Agreement And Release (the“Agreement”) [Dkt. No. 136-1] is hereby
23 amended to read, in its entirety, as follows:

24 For purposes of this paragraph, “Settled Claims” means and includes any and all
25 claims, actions, causes of action, offsets or liabilities, whether known or
26 unknown, suspected or unsuspected, contingent or matured, which Plaintiffs or
any member of the Settlement Class has had, now has, or may in the future have,
arising from or relating to the special forbearance agreements and offer letters
substantially similar to those sent to Plaintiffs (attached hereto as Exhibit A) that
27 were sent to any such member of the Settlement Class between March 12, 2009
and October 31, 2012. Excluded from this release are all claims for actual,
28 economic damages (other than trial plan payments).

1 IT IS FURTHER STIPULATED, by and between the Parties, that the Agreement is hereby
2 amended by replacing the Claim Form appended thereto as Exhibit C with the Claim Form
3 appended to this stipulation.

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5 DATED: April 17, 2013

SEVERSON & WERSON
A Professional Corporation

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8 By: /s/ Michael J. Steiner
Michael J. Steiner

9 Attorneys for Defendant Wells Fargo Bank, N.A.

10 LAW OFFICE OF PETER FREDMAN

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13 By: /s/ Peter B. Fredman
Peter B. Fredman

14 Attorneys for Plaintiffs

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19 Dated: 4/18/13

